

Exhibit 4

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BRIAN T. MOSS *
JEFFREY M. LENKOV
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DAVID V. ROTH
JENNIFER L. SUPMAN
KATHLEEN A. HUNT *
STEVEN J. RENICK
JAMES E. GIBBONS
DANIEL B. HERBERT *
MARK A. HAGOPIAN
DONALD R. DAY *
D. HIEP TRUONG
MICHAEL A. WEISMANTEL
JANET D. JOHN *
JOHN M. HOCHHAUSLER
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KEVIN H. LOUTH
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TOBY D. BUCHANAN
LADELL H. MUHLESTEIN
SEVAN GOBEL

RICHARD G. GARCIA
DEBORA VERDIER †
JEANETTE DIXON
KENNETH S. KAWABATA
STEVEN AMUNDSON *
RICHARD MACK †
TONY M. SAIN
MARILYN R. VICTOR *
MARTIN HOLLY
MINAS SAMUELIAN
LALO GARCIA
CHRISTOPHER DATOMI
ANTHONY CANNIZZO
GARY L. POPHAM, JR. *
MAIJA OLIVIA *
ROLAND TONG
JONATHAN J. LABRUM *
JONATHAN D. SAYRE
KAREN LIAO
JULIE M. FLEMING
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January 14, 2019

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† Admitted to Practice Law in
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VIA E-MAIL AND U.S. MAIL

Mr. Steven R. Pounian
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750 Third Ave.
New York, NY 10017
E-Mail: spounian@kreindler.com

Re: In re: Terrorist Attack on 9/11/2001

Our File No.: : 7037-70000

Dear Mr. Pounian:

This letter is in regards to our telephone conversation of January 10, 2019 and our email correspondence of that same day.

As we agreed, please find attached the unredacted versions of the documents which we agreed to produce in exchange for your agreement to not serve the subpoena duces tecum of December 6, 2018, which has not been properly served.

We understand from your email correspondence that you intend to serve additional subpoenas on the mosque. As we discussed during our telephone conversation, we would greatly appreciate the opportunity to discuss any potential future subpoenas with you beforehand, which could perhaps streamline the process.

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Request No. 2

2. Regarding any person other than Thumairy who was employed at the Los Angeles Consulate and simultaneously was an imam or held another position or title at the King Fahad Mosque at any time during the applicable time period, produce documents concerning;

a. his appointment, title(s), activities and responsibilities at the King Fahad Mosque during the applicable time period;

b. his pay, pay increases, awards, bonuses, stipends and allowances from January 1, 1998 through and including 2003;

c. his performance reviews during the applicable time period;

d. his sermons, speeches and writings during the applicable time period;

e. the instructions or directions provided by him by the King Fahad Mosque during the applicable time period;

f. the funds and resources under his control at the King Fahad Mosque during the applicable time period;

g. his responsibilities for the finances of the King Fahad Mosque during the applicable time period;

h. his superiors and supervisors at the King Fahad Mosque during the applicable time period;

i. his assistants or other persons under his supervision or oversight at the King Fahad Mosque during the applicable time period;

j. his phone, fax and email records at the King Fahad Mosque during the applicable time period;

k. King Fahad Mosque board meetings attended by the person during the applicable time period; and

l. his calendar and/or record of his activities at the King Fahad Mosque during the applicable time period.

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Supplemental Response to Request No. 2

Please find additional documents attached. However, please note that the King Fahad Mosque specifically objects that the individuals listed on these documents were not imams nor did they otherwise hold positions relating to the mosque. The documents produced with this correspondence are produced in accordance with our agreement.

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, in its correspondence of July 30, 2018.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: To the extent that this request seeks production of responsive unprivileged items, such documents are produced herewith.

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We look forward to working together to move forward in a spirit of cooperation. Please do not hesitate to contact us regarding these responses. Thank you.

Very truly yours,

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**



Eugene P. Ramirez, Esq.

Michael Watts, Esq.

EPR/MRW

Enclosure

cc: Mr. Andrew Shen